

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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BLUE RIDGE INSURANCE CO.

CIVIL ACTION

V.

NO.: 02-4723

CHRISTOPHER J. COSMAS and  
OLD GUARD INSURANCE COMPANY

**ORDER**

AND NOW, this                      day of                      , 2002, it is ORDERED and  
DECREED that the deadlines as set forth in the Scheduling Order of October 8, 2002 be  
extended thirty (30) days.

BY THE COURT:

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J.

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**MOTION FOR EXTENSION OF SCHEDULING ORDER DEADLINES**

Defendant, Christopher J. Comas (incorrectly identified as Christopher J. Cosmos) hereby moves this Honorable Court by and through his attorneys, Stampone, D'Angelo & Renzi, P.C., for a thirty (30) day extension of the Scheduling Order deadlines for the following reasons:

1. The October 8, 2002 Scheduling Order designates, inter alia, that all discovery shall be completed by December 2, 2002; all Motions for Summary judgment and Cross Motions for Summary Judgment, as well as any Stipulations of Fact related thereto, shall be filed by December 16, 2002; and responses to Motion for Summary Judgment shall be filed within thirty (30) days of the date of filing of said motions.

2. On or about December 10, 2002, a Stipulation of Facts has been submitted by the parties to the Court.

3. Because of his trial schedule, counsel for Defendant, Christopher J. Cosmas, has not had the opportunity to prepare a Motion for Summary Judgment, and intends to use the relative inactivity of the holiday season to prepare said motion.

4. Counsel for Defendant, Christopher J. Cosmas has spoken to both counsel for Plaintiff, Blue Ridge Insurance Company and counsel for Defendant, Old Guard Insurance Company, and neither counsel has communicated any opposition to this extension request.

WHEREFORE, Defendant, Christopher J. Cosmas, respectfully requests that this Court enter an Amended Scheduling Order extending all deadlines by thirty (30) days.

Respectfully submitted,

STAMPONE, D'ANGELO & RENZI, P.C.

By: \_\_\_\_\_  
Rudolph V. De George, II, Esquire  
Attorney for Defendant,  
Christopher J. Cosmas

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**CERTIFICATE OF SERVICE**

RUDOLPH V. DE GEORGE, II, ESQUIRE, hereby certifies that Defendant, Christopher J. Cosmas' Motion for Extension of Discovery Deadline, was served via first class mail on the following:

Timothy Burdette, Esquire  
ANSTANDIG, MCDYER, BURDETTE & YURCON  
1300 Gulf Tower  
707 Grant Street  
Pittsburgh, PA 15219-1911

Allan C. Molotsky, Esquire  
POST & SCHELL  
1800 John F. Kennedy Boulevard  
Philadelphia, PA 19103-7480

STAMPONE, D'ANGELO & RENZI, P.C.

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Rudolph V. De George, II, Esquire  
Attorney for Defendant,  
Christopher J. Cosmas